



Hogan Lovells US LLP
100 High Street - 20th Floor
Boston, MA 02110
T +1 617 371 1000
F +1 617 371 1037
www.hoganlovells.com

February 1, 2019

By ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman:

We represent defendant Richard Gaffey in the above-referenced matter. In connection with the Court's decision at the bail modification hearing on January 24, 2019, we are notifying the Court that Mr. Gaffey will post his two homes as security in order to permit him to travel to Mexico with his wife from February 10, 2019 through February 17, 2019. We therefore respectfully request that the Court issue an order amending Mr. Gaffey's bail conditions by requiring him to post a bond in the amount of \$680,000, the equity value of his two homes, secured by his interest in those two properties, which are located at 3 Onondaga Lane, Medfield, Massachusetts, and 21 Nashawena Park, Oak Bluffs, Massachusetts. The government consents to this request.

We further respectfully request that the Court issue an order authorizing the United States Pretrial Services Office, upon execution of the appearance bond, to release Mr. Gaffey's passport and to permit him to travel to Mexico on Sunday, February 10, 2019. Mr. Gaffey will return his passport to the United States Pretrial Services Office following his return on February 17, 2019.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R. Buehler", written over a horizontal line.

Robert B. Buehler

Partner
robert.buehler@hoganlovells.com
D + 1 212 918 3261

cc: AUSA Sarah E. Paul (by ECF)
AUSA Thane Rehn (by ECF)